

PHILLIPS & ASSOCIATES

*Attorneys at Law*

45 BROADWAY, SUITE 620, NEW YORK, NEW YORK 10006

TEL: (212) 248-7431 FAX: (212) 901-2107

[WWW.NYCEMPLOYMENTATTORNEY.COM](http://WWW.NYCEMPLOYMENTATTORNEY.COM)

A PROFESSIONAL LIMITED LIABILITY COMPANY

April 10, 2023

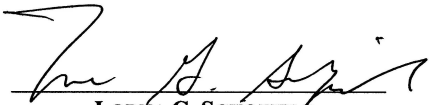
**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Application granted in part.** The initial pretrial conference scheduled for April 19, 2023, is adjourned to **May 3, 2023, at 4:00 P.M.** At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **April 26, 2023, at 12:00 P.M.**

Dated: April 11, 2023  
New York, New York

RE: Greenberg v. Televisa Univision, Inc., et al  
Civil Action No. 23-cv-189 (LGS)

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Your Honor:

This office represents Plaintiff in the above-referenced matter. Plaintiff writes to respectfully request that the initial conference scheduled for April 19, 2023 at 4:00 p.m., as well as the deadline to submit a corresponding joint letter in advance of the conference, be adjourned *sine die*. The requested adjournment is necessary because, following conferral with opposing counsel and our client, the parties agree this action should move forward in the United States District Court for the District of New Jersey. Plaintiff intends to file a motion to transfer venue in this matter to United States District Court for the District of New Jersey pursuant to 28 U.S. Code § 1404(a) on or before this Friday, April 14, 2023. Defendant has informed the undersigned they will consent to this motion and do not intend to file an opposition.

Plaintiff thanks the Court for its time and attention.

Respectfully submitted,

**PHILLIPS & ASSOCIATES,  
ATTORNEYS AT LAW, PLLC**

By: /s/ Shawn Clark  
Shawn Clark, Esq.